ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Mailing Online Service, 1998   )

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: LEE GARVEY
(OCA/USPS-T1-13-18)
(July 24, 1998)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate

Commission, the Office of the Consumer Advocate hereby submits interrogatories and

requests for production of documents. Instructions included with OCA interrogatories

OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby

incorporated by reference.

Respectfully submitted,

Gail Willette
Acting Director
Office of the Consumer Advocate

Emmett Rand Costich
Acting Assistant Director

OCA/USPS-T1-13. Please refer to your testimony at page 1, lines 10-13.

a.   Please confirm that the "World Wide Web-based software application" was

        developed by a firm under contract to the Postal Service. If you do not confirm,

        please explain.

b.   Please provide a copy of the contract between the Postal Service and the firm

        referred to in part (a) of this interrogatory.

c.   Please provide a copy of the Request for Proposals (RFP) or other document

        soliciting bids from firms interested in developing the World Wide Web-based

        software application.

OCA/USPS-T1-14. Please refer to your testimony at page 6, lines 5-6. During the

expanded (market) test period, please describe the means by which the Postal Service

plans to provide equal access to all potential users in the three metropolitan areas

constituting the geographic area of the market test, pursuant to 39 CFR 3001.162(h).

OCA/USPS-T1-15. Please refer to your testimony at page 10, lines 15-18.

a.   Please explain the phrase "like printing and finishing options."

b.   Please explain the phrase "batch address file."

c.   Please confirm that two types of files will be transmitted to the commercial

        printers, 1) a print file containing documents having like printing and finishing

        options and 2) the batch address file. If you do not confirm, please explain.

d.   Please explain the process by which commercial printers will utilize the batch

address file so that Mailing Online mail pieces will be "presorted to the maximum

depth of sort."

OCA/USPS-T1-16. Please refer to your testimony at page 10, lines 18-21. Please

confirm that one finishing option for Mailing Online customers is mail pieces without

envelopes. If you do not confirm, please explain.

OCA/USPS-T5-17. Please refer to Exhibit USPS 1A, "Mailing Online Process

Diagram." One of the boxes in that diagram is entitled "Mailing Online System Merge

and Batch."

a.   One of the tasks under Merge and Batch is "Batches mailpieces with similar job

characteristics." During the operations test, what is the maximum number of

possible categories of batches? I.e., How many *different* categories of "job

characteristics" are there? How is each category defined in the System

software? Please provide a copy of the lines of code that perform this task.

b.   Please provide the following volume information from the operations test.

Separately for each possible category of "job characteristics," provide (i) total

volume to date, (ii) maximum batch volume to date, (iii) minimum batch volume

to date, (iv) average volume per batch to date.

c.   One of the tasks under Merge and Batch is "Batches mailpieces by delivery

destination." Please define "delivery destination." If this does not mean "entry

facility," please explain. During the operations test, what is the maximum

number of possible delivery destinations? How is each possible delivery destination defined in the System software? Please provide a copy of the lines of code that perform this task.

d.   Please provide the following volume information from the operations test. Separately for each possible "delivery destination," provide (i) total volume to date, (ii) maximum batch volume to date, (iii) minimum batch volume to date, (iv) average volume per batch to date.

e.   One of the tasks under Merge and Batch is "Presorts batches to finest level." During the operations test, is there a minimum size presort batch, e.g., one full tray? Does "finest level" mean presorting to the same depth as would the entry facility prior to dispatch? Does "finest level" mean presorting to the same depth as would a presort mailer depositing First-Class Mail at the entry facility? Please explain.

f.   During the operations test, did the System software use more than one sort scheme to "Presort[] batches to finest level"? E.g., did sort schemes vary by day of the week, day of the month, or season of the year? During the operations test, did the entry facility in Texas use more than one outgoing sort scheme? E.g., did sort schemes vary by day of the week, day of the month, or season of the year? Please explain how the sort scheme(s) used by the System software were matched or otherwise coordinated with the sort scheme(s) used at the entry facility in Texas.

g.   One of the tasks under Merge and Batch is "Transfers data files to print site servers." During the operations test, is there a cutoff time prior to which this task

must be completed each day? If not, why not? If so, how is this cutoff time

determined? If so, please provide a copy of the lines of code in the System

software that enforce this cutoff time.

OCA/USPS-T1-18. Please refer to Exhibit USPS 1A, "Mailing Online Process

Diagram." One of the boxes in that diagram is entitled "Job Approval And Payment

Authorization." During the operations test, are Mailing Online customers informed prior

to job approval when their jobs will be printed, entered into the mailstream, or

dispatched from the entry facility? If not, why not? If so, please provide a copy of the

lines of code in the System software that perform this task. Does the Postal Service

offer any assurance or estimate of the probability that a particular job will be dispatched

from the entry facility on the same day the job is approved? If not, why not? If so, what

is the basis for this assurance or estimate?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all
participants of record in this proceeding in accordance with section 12 of the rules of
practice.

Emmett Rand Costich
Attorney

Washington, D.C. 20268-0001
July 24,1998